

HEATHER E. WILLIAMS, #122664  
Federal Defender  
MEGAN T. HOPKINS, #294141  
Assistant Federal Defender  
801 I Street, 3<sup>rd</sup> Floor  
Sacramento, CA 95814  
Tel: 916-498-5700/Fax: 916-498-5710

Attorney for Defendant  
JOEY DONALD STEWART CAMPBELL

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No. 2:21-cr-206-DAD
	)	
Plaintiff,	)	STIPULATION FOR TEMPORARY
	)	MODIFICATION OF CONDITIONS OF PRETRIAL
vs.	)	RELEASE; <del>{PROPOSED}</del> ORDER
	)	
JOEY DONALD STEWART	)	Hon. Jeremy D. Peterson
CAMPBELL,	)	
	)	
Defendant.	)	

The defendant, JOEY DONALD STEWART CAMPBELL, by and through his attorney of record, Assistant Federal Defender Megan T. Hopkins, and the UNITED STATES, by and through its attorney of record, Roger Yang, hereby stipulate to and request an order from this Court temporarily modifying the conditions of Mr. Campbell's pretrial release to permit him to attend a musical performance with his mother at the Hard Rock Casino in Wheatland, CA. The parties have conferred with Mr. Campbell's assigned pretrial services officer, who approves of this stipulated modification.

Mr. Campbell has been on pretrial release in this district since October 2021, on a \$100,000 secured appearance bond. *See* Dkt. 12. Additionally, Mr. Campbell was appointed a third party custodian: Doreen Bailey. Mr. Campbell is in compliance with all of his conditions of release. One of those conditions of release is location monitoring. Mr. Campbell is subject to home detention, and therefore must remain inside his residence except for pre-approved employment; education; religious services; medical, substance abuse, or mental health treatment;

1 attorney visits; court appearances; court ordered obligations; or other activities authorized by the  
2 pretrial services officer<sup>1</sup>.

3 Mr. Campbell requests, and the parties agree and so stipulate, that his Conditions of  
4 Release be temporarily amended to specifically permit him to attend a musical performance at  
5 the Hard Rock Casino in Wheatland, CA on October 20, 2022 from 8 p.m. to 11:00 p.m. Given  
6 the location of the event, there will be no minors present/permitted within the music venue or  
7 casino. Mr. Campbell's mother and third-party custodian will be in attendance with him and will  
8 be responsible for driving Mr. Campbell to and from the performance.

9 Hard Rock Casino is approximately 45 minutes by car from Mr. Campbell's residence.  
10 Allowing some additional time for traffic, the parties request a temporary modification of pretrial  
11 conditions to permit Mr. Campbell depart his home at 7:00 p.m. on October 20, 2022, and to  
12 return home by 11:55 p.m. that same day. Mr. Campbell will be in the company of his third-  
13 party custodian during the entire event. Mr. Campbell will return directly to his residence at the  
14 conclusion of the performance.

15 The proposed temporarily amended condition is attached to this request. The parties do  
16 not request a hearing in this matter in light of this stipulation.

17  
18 Respectfully submitted,

19 DATED: October 19, 2022

HEATHER E. WILLIAMS

Federal Defender

21 /s/ Megan T. Hopkins

22 MEGAN T. HOPKINS

Assistant Federal Defender

23 Attorney for JOEY DONALD STEWART CAMPBELL

24  
25  
26  
27  
28 <sup>1</sup> Pretrial services interprets this condition to only permit their approval of other activities which are deemed  
essential, with all other activities requiring the approval of the Court.

1 DATED: October 19, 2022

PHILLIP A. TALBERT

2 United States Attorney

3 /s/ Roger Yang

4 ROGER YANG

Assistant United States Attorney

5 Attorney for the United States

6  
7  
8 **[PROPOSED] ORDER**

9 GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED THAT the  
10 Special Conditions of Release for defendant, Joey Donald Stewart Campbell, be Temporarily  
11 Amended such that he is permitted to depart his residence at 7:00 p.m. on October 20, 2022, to  
12 attend a musical performance at Hard Rock Casino in Wheatland, CA and return to his residence  
13 no later than 11:55 p.m. on October 20, 2022. All other conditions of pretrial release shall  
14 remain in force.

15 The Temporary Amended Special Condition of Release is hereby adopted.

16  
17 DATED: October 19, 2022

18   
19 HON. JEREMY D. PETERSON  
United States Magistrate Judge